

Sustainability Appraisal (SA) of the Sevenoaks Local Plan

**SA Report
Non-technical Summary (Draft)**

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Quality information

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1. Introduction

- 1.1.1. This is the Non-technical Summary (NTS) of the Sustainability Appraisal (SA) Report published as part of the SA process for the Sevenoaks Local Plan. Specifically, the SA Report is published alongside the proposed submission version of the Local Plan under Regulation 19 of the Local Planning Regulations (2012).
- 1.1.2. The Local Plan aims to establish a strategy for growth and change across the District up to 2042, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. The aim of the SA Report aims is to present an appraisal of the plan alongside 'reasonable alternatives' with a view to informing representations and subsequent plan finalisation (see discussion of next steps, below). The SA Report is structured so as to:
 - explain work up to this point including appraisal of **reasonable alternatives**;
 - present an appraisal of **the proposed submission plan**; and
 - discuss **next steps**.
- 1.1.4. This NTS is structured as per the SA Report.

2. Reasonable alternatives (RAs)

- 2.1.1. Within the main report the key sections are as follows:
 - Section 4 – explains a focus on RAs and specifically in the form of **growth scenarios**.
 - Section 5 – defines growth scenarios.
 - Section 6 – appraises growth scenarios.
 - Section 7 – explains why the preferred scenario is 'justified' in light of the appraisal.

2.2. Defining growth scenarios

- 2.2.1. Section 5 (defining growth scenarios) is a key section that explains a lengthy process of evidence-gathering and decision-making / narrowing of options over time.
- 2.2.2. For context, 'growth scenarios' are defined as alternative approaches to the supply of land, primarily by allocating sites, in order to provide for development needs alongside delivering on wider objectives. Identifying a supply of land is a key aim of any local plan.
- 2.2.3. All local plans summarise the proposed broad approach to land supply in a 'key diagram', and so growth scenarios are defined, in short, as alternative key diagrams.
- 2.2.4. A starting point for defining growth scenarios is always understanding of local housing need (LHN), as defined by the Government's standard method. For Sevenoaks the plan period is 2027 to 2042 and the standard method sets LHN at 1,164 dwellings per annum (dpa), hence LHN over the plan period is $15 \times 1,164 = 17,460$ homes in total.
- 2.2.5. The next question is whether there are any clear reasons for the local plan setting a 'housing requirement' either above or below LHN, where the housing requirement is defined as the number of homes that the local plan commits to delivering, in the knowledge that under delivery leads to punitive measures, namely the presumption in favour of sustainable development (NPPF para 11).
- 2.2.6. Setting the housing requirement precisely at LHN is essentially the default approach and the approach taken by the great majority of local plans nationally. However, for Sevenoaks the main report discusses how there are a range of high level / strategic arguments to be made in support of a housing requirement set either below LHN (such that the Local Plan generates unmet need) or above LHN.

- 2.2.7. These arguments for a housing requirement that departs from LHN have been explored in detail over the course of the plan-making / SA process (there have been three consultations under Regulation 18 with an Interim SA Report published at each stage). In summary: the case for 'lower growth' relates to the extent of constraints to growth affecting the District, most notably the Kent Downs National Landscape (NL) which constrains Sevenoaks and several other higher order settlements; and the case for 'higher growth' relates to considerable risk of neighbouring authorities generating unmet need. However, at this stage in the process it is considered that the case to be made for 'higher growth' is reduced relative to the situation at past Regulation 18 stages.
- 2.2.8. The next consideration is 'existing supply' from sites with planning permission, accounting for the latest monitoring data (i.e. monitoring of sites with planning permission, including monitoring of homes within these sites that have been constructed). The latest monitoring data is accurate as of 1st July 2025 and from this data it is anticipated that there will be supply of 3,872 homes from sites currently with planning permission over the plan period, i.e. from 1st April 2027 to 1st April 2042. This figure will need to be updated in light of new monitoring data in due course, and could well increase due to the likelihood of sites unexpectedly gaining planning permission under the presumption in favour of sustainable development.
- 2.2.9. Also, it is appropriate to account for future supply from windfall, i.e. to assume a future supply of homes that will come forward in line with policy despite not having a local plan allocation. The total windfall assumption for the plan period is 949 homes.
- 2.2.10. This leaves a residual figure of 12,639 homes (17,460 - 3,872 – 949) to plan for through the Local Plan, which essentially means via new allocations (there is also potential to assume supply from 'broad locations', but in practice the focus is on allocations). On the one hand this residual figure should be considered a minimum, because there is a need to consider a supply 'headroom' as a contingency for delivery issues, i.e. with a view to ensuring that the housing requirement can be delivered in practice (year-on-year).¹ However, on the other hand, and as discussed, 'existing supply' could increase, which would commensurately reduce the residual figure for the Local Plan.
- 2.2.11. Growth scenarios for the Sevenoaks Local Plan are therefore essentially alternative approaches to delivering in the region of 12,639 homes via site allocations.
- 2.2.12. With regards to the question of "which allocations", a first port of call is allocation of sites within urban areas, i.e. outside of the Green Belt. Maximising urban supply has been a key focus of plan-making to date, and the emerging proposed approach has also been repeatedly scrutinised through the SA process, including with a view to ensuring that the identified supply is realistic (to avoid storing problems for the future, i.e. a situation whereby the Council struggles to deliver on its committed housing requirement). At the current time the proposal is to allocate 29 urban sites for 1,459 homes in total.
- 2.2.13. The next port of call is then sites that comprise previously developed land (PDL) in the Green Belt, and again the proposed approach has evolved over the course of the plan-making process. At the current time the proposal is to allocate 9 PDL sites for 279 homes in total and 7 part PDL sites for 273 homes in total.
- 2.2.14. The final question is in respect of greenfield sites in the Green Belt, and this is undoubtedly the key question at the very heart of the Local Plan.
- 2.2.15. The main report presents detailed work to consider site allocation options, informed by a discussion of broad spatial strategy factors, and including detailed discussion of site options (and combinations of site options) at each of the District's settlements in turn. Also, it should be noted that this work builds upon work from the Regulation 18 stages.
- 2.2.16. Headline considerations in respect of greenfield Green Belt options as follows:

¹ Specifically, there is a need for a supply headroom over the early years of the plan period to ensure that the Council can maintain a 'five year housing land supply' (5YHLS) ahead of a new local plan that represents a new opportunity to boost supply. It is also important to note that as part of the 5YHLS calculation there is a need to apply a 5% or 20% 'buffer' (NPPF para 79).

- The emerging proposed approach involves 45 allocations to deliver a total of 10,527 homes in the plan period (plus some sites would continue to deliver beyond 2042), which in combination with permissions, windfall and urban/PDL allocations leads to a total supply of 17,319 homes in the plan period, i.e. a figure just short of LHN.
- Comfortably the largest proposed allocation is Pedham Place, which involves a new settlement to the south east of Swanley (2,650 homes in the plan period). It has been considered in detail throughout the plan-making SA process and could deliver a range of benefits, but it is located within the Kent Downs NL such that there is a need to consider one or more growth scenarios whereby it is *not* allocated.
- As such, there is a need to identify a selection of 'omission sites' that could be allocated under scenarios without Pedham Place – in order to replace some or all of the lost supply – or which could be allocated in order to deliver higher growth.
- The only realistic omission sites for testing are greenfield Green Belt sites.
- It is difficult to pinpoint omission sites for testing, but for current purposes (defining RA growth scenarios) an indicative set of omission sites has been identified, and it is considered that these sites can be placed in a broad order of preference:
 - Edenbridge – is a 'town' in the settlement hierarchy and an omission site for ~600 homes was previously a preferred option at the Regulation 18 stage in 2025.
 - Swanley – is a 'town' in the settlement hierarchy and a site to the east (ST4-10) is now proposed to be allocated for 139 homes but was previously a preferred option for 300 homes at the Regulation 18 stage in 2025.
 - Hextable – is a fourth tier settlement ('secondary service settlement') but well-connected to higher order settlements and subject to limited constraint in some respects. There are two omission sites to the north west that were previously preferred options to deliver ~300 homes at the Regulation 18 stage in 2025.
 - Kemsing – is a fourth tier settlement but has access to a railway station and is in proximity to Sevenoaks. An omission site to the south was previously a preferred option to deliver ~150 homes at the Regulation 18 stage in 2025.
 - Broke Hill – the current proposed approach involves a small new settlement for 741 homes, but at the Regulation 18 stage in 2025 consideration was given to the possibility of a more comprehensive scheme to deliver ~1,400 homes (N.B. this was not a preferred option, but was considered in detail via the RA growth scenarios).
 - Westerham – is a 'town' in the settlement hierarchy and the proposed approach involves very low growth. In both 2022 and 2023 consideration was given to the possibility of allocating a package of four sites in the Kent Downs NL for 180 homes in total and, on balance, it is still considered reasonable to test allocating the same four sites under a 'needs must' scenario whereby Pedham Place is not allocated.²

2.2.17. This leads to the following RA growth scenarios:

- Scenario 1 – the emerging proposed approach
- Scenario 2 – Scenario 1 **minus** Pedham Place **plus** higher growth to the east of Swanley (Reg 18 approach at ST4-10) and at Edenbridge (Reg 18 omission site)
- Scenario 3 = Scenario 2 **plus** higher growth at Kemsing and Hextable (as per Reg 18)
- Scenario 4 = Scenario 3 **plus** higher growth at Broke Hill (as tested at Reg 18)
- Scenario 5 = Scenario 4 **plus** higher growth at Westerham (four NL sites)
- Scenario 6 = Scenario 1 **plus** additional growth at Edenbridge (Reg 18 omission site)

² In both 2023 and 2025 consideration was also given to the possibility of allocating further sites in the NL that are now omission sites, namely sites at Sevenoaks (two sites to the north west and then a site to the west that is now allocated in part, specifically with the allocation excluding the part of the site that intersects the NL) and at West Kingsdown (a small site to the north and a larger site to the south east that might help to deliver comprehensive growth alongside an adjacent proposed allocation). However, on balance these sites are ruled out at this stage, i.e. in respect of omission sites in the NL attention focuses on Westerham, including because there is a strategic case for higher growth at Westerham to balance against the NL constraint.

N.B. a pragmatic approach is taken to combining supply options in order to minimise the number of scenarios. In particular, it is acknowledged that there is a case for testing additional higher growth scenarios (i.e. higher growth than Scenario 6), but there is a desire to avoid more than 6 scenarios with a view to an accessible/engaging appraisal.

2.2.18. The scenarios are presented in full in Table A.

Table A: The reasonable alternative growth scenarios (N.B. constants greyed out)

		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Housing supply component			- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
Permissions		3,872	3,872	3,872	3,872	3,872	3,872
Windfall		949	949	949	949	949	949
Urban allocations		1,459	1,459	1,459	1,459	1,459	1,459
PDL allocations		279	279	279	279	279	279
Part PDL allocations		273	273	273	273	273	273
Greenfield Green Belt allocations	Sevenoaks	2,148	2,148	2,148	2,148	2,148	2,148
	Swanley	867	917	917	917	917	867
	Edenbridge	1,434	2,034	2,034	2,034	2,034	2,034
	Westerham	0	0	0	0	180	0
	New Ash Green	844	844	844	844	844	844
	Otford	203	203	203	203	203	203
	Hartley	190	190	190	190	190	190
	Pedham Place	2,560	0	0	0	0	2,560
	Eynsford	0	0	0	0	0	0
	Hextable	528	528	828	828	828	528
	Kemsing	211	211	361	828	828	211
	Pratts Bottom	0	0	0	0	0	0
	Seal	0	0	0	0	0	0
	South Darenth	323	323	323	323	323	323
	West Kingsdown	404	404	404	404	404	404
	Broke Hill	741	741	741	1,400	1,400	741
	Other villages	34	34	34	34	34	34
Total (2027- 2042)		17,319	15,409	15,859	16,985	17,165	17,919
% LHN (17,460)		-1%	-12%	-9%	-3%	-2%	3%

2.3. Growth scenarios appraisal

2.3.1. Section 6 of the main report presents an appraisal of the growth scenarios under the ‘SA framework’, which primarily comprises a list of 12 sustainability topics. The appraisal concludes with a summary appraisal ‘matrix’ with a column for each of the SA topics and a row for each of the scenarios. The summary matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence, and “?” used where there is uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green** / **no colour**.³

Table B: The reasonable growth scenarios – summary appraisal findings

	Scenario 1	Scenario 2 - Pedham Pl. + Edenbridge + Swanley	Scenario 3 - Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	Scenario 4 - Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	Scenario 5 - Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	Scenario 6 + Edenbridge
Air quality	=	=	=	=	=	=
Biodiversity	★1	2	2	2	2	★1
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	★1	2	2	2	★1	★1
Communities	★1	2	2	2	2	2
Economy & employment	★1	2	2	2	2	★1
Historic environment	★1	2	2	2	2	★1
Homes	3	6	5	4	2	★1
Landscape	2	★1	★1	★1	2	2
Land, soils and resources	★1	2	2	2	2	★1
Transport	2	★1	★1	★1	★1	2
Water	?	?	?	?	?	?

³ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- 2.3.2. The appraisal shows a mixed picture, with all of the scenarios associated with pros and cons, and it is for the Council to weigh these pros and cons before deciding on which of the scenarios best represents sustainable development 'on balance'.
- 2.3.3. As part of this, account can be taken of the appraisal findings that: A) Scenario 1 (the proposed submission approach) is ranked first under the greatest number of sustainability topic headings; and B) Scenario 6 (which sees additional growth at Edenbridge, as per the approach at Reg 18) performs best in terms of predicted effects.
- 2.3.4. However, it is important to be clear that this does not automatically mean either Scenario 1 or Scenario 6 is appraised as performing best overall, because: A) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and the topics should not necessarily be assumed to have equal weight); and B) the topic specific appraisal conclusions are open for debate (indeed, an aim is to spark debate).
- 2.3.5. For example, the Council (or any interested party) might choose to give weight to housing, landscape and transport objectives and, having done so, reach a conclusion that there is an overall preference for Scenario 4 or Scenario 5 (which partially replace Pedham Place with an indicative set of omission sites), perhaps alongside a view that the appraisal overplays the benefits and/or underplays the disbenefits of Scenarios 1 and 6. Furthermore, boosting supply from smaller sites under Scenarios 4 and 5 could assist with a robust housing land supply such that there is greater confidence in being able to maintain a five year housing land supply (5YHLS) over the coming years and, in turn, a reduced risk of the Council facing the presumption in favour of sustainable development, with positive implications across a range of objectives.
- 2.3.6. Having made these overarching remarks, set out below is an explanation of the conclusion reached under each of the sustainability topic headings. With regards to appraisal methodology, further points to note are as follows:
- Variables – each of the appraisal narratives begins with a discussion of the factors that allow for differentiation between the scenarios, i.e. a discussion of the 'variables'.
 - Constants – having discussed the variables, each narrative then considers the proposed allocations that are a 'constant' across the scenarios such that they do not have a bearing on conclusions reached in terms of the differential performance of the scenarios but do have a bearing on predicted 'significant effects'.
 - Significant effects – each appraisal narrative includes a discussion of significant effects, but it should be noted that concluding on significant effects is challenging and highly subjective. There is a focus on explaining how views on predicted significant effects have evolved over the course of the plan-making process, i.e. how the current conclusion compared to the conclusion reached at the two Reg 18 draft plan stages. Also, there is a need to note that significant effects are predicted with minimal assumptions made regarding development management (DM) policies (particularly site-specific policies), with a view to an unbiased appraisal ('a level playing field').
 - Limitations – the appraisal below may need to be updated prior to publication to ensure that it reflects the latest evidence and understanding, because the appraisal must be fully up-to-date at the point of publication, such that it is best placed to inform representations and the subsequent Examination in Public (the SA Report must be submitted for EiP as previously published). At the time of writing the plan is mostly fully formed, but aspects remain in draft including site specific policies, the housing supply trajectory / stepped housing requirement and graphics (including the key diagram), and some key sources of evidence remain in draft, including the Infrastructure Delivery Plan (IDP), the Transport Assessment and the Housing and Economic Land Availability Assessment (HELAA). Whilst the headline appraisal conclusions presented below are unlikely to change, there may be a need to refine the appraisal text. Finally, it should be noted that there will naturally be a need to update the appraisal below to reflect any changes made to the plan, or new evidenced introduced, as part of the process of elected member deliberation / decision-making.

Air quality

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
=	=	=	=	=	=

- 2.3.7. Whilst the previous appraisal flagged significant concerns, particularly under the highest growth scenario appraised at the time (which involved supply totalling LHN + 19%), the situation has evolved in that all of the District's air quality management areas (AQMA's) have recently been revoked in light of monitoring showing improved air quality.
- 2.3.8. It remains the case that there is a blanket AQMA covering the entirety of the London Boroughs bordering Sevenoaks, but it is difficult to suggest this as a reason for not directing higher growth to the north of the District, recognising that this is broadly speaking a relatively accessible part of the District, for example higher growth at Broke Hill would involve directing new homes to a location with access to a well-connected rail station. With regards to directing higher growth to third tier settlements (Kemsing and Hextable), whilst this is not ideal in terms of transport / accessibility and therefore air quality, both of the villages are quite well-connected. With regards to higher growth at Westerham, whilst the previous extensive AQMA along the A25 has now been revoked, it is reasonable to assume that traffic through the village remains an issue for environmental quality and potentially air quality, such that there is a need to caution against piecemeal higher growth that would not deliver a village bypass; however, the level of growth under consideration (Scenario 5) is modest at ~180 homes.
- 2.3.9. A final consideration is a strong transport and therefore air quality case to be made for not generating unmet housing need, and also providing for unmet need arising from well-connected neighbouring authorities where possible.⁴ This makes it challenging to conclude a preference for low growth (Scenario 2), with a further consideration being that Pedham Place (Scenarios 1 and 6) would deliver in the longer term (over which time national air quality will likely continue to improve).
- 2.3.10. In conclusion, at this stage the alternatives are judged to perform broadly on a par, and a neutral effect is predicted. This is a departure from previous appraisals.

⁴ This is for two reasons. Firstly, providing for housing needs at locations distant from source can generate a need to travel. Secondly, early clarity regarding broad growth distribution sub-regionally assists with strategic transport planning.

Biodiversity

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
1	2	2	2	2	1

- 2.3.11. Biodiversity is a strategic constraint to growth within the District, although constraint varies considerably between sub-areas and can be quite site-specific. It is also recognised that there is a national requirement for development sites to achieve a 10% Biodiversity Net Gain (BNG), and the Kent LNRS will help to ensure an effective BNG regime. However, despite the BNG regime, it remains the case that there is a need to direct growth in such a way that the emphasis remains firmly on avoiding impacts in the first instance rather than relying on mitigation / compensation.
- 2.3.12. The equivalent appraisal in 2025 reflected a view that Pedham Place “represents a good opportunity to direct growth to a location with limited biodiversity constraint”, and further stated (quoting the previous report from 2023) that “...new strategic habitat creation onsite or nearby could prove well-targeted, noting large SSSI woodlands along the River Darent corridor to both the north and south. Farningham Wood SSSI is in close proximity (~800m) to the north, but there appears to be limited connectivity with Pedham Place (given the M20), which serves to allay recreational pressure concerns.”
- 2.3.13. Subsequently through the consultation Natural England did not raise significant biodiversity concerns regarding Pedham Place (assuming there will not be ease of access to Farningham Wood SSSI), and the representation received from Kent Wildlife Trust (KWT) in 2025 did not focus overly on Pedham Place, primarily raising concerns regarding loss of Open Mosaic Habitat on Previously Developed Land. This latter constraint remains an issue ahead of further work, and given the proposal for 2,600 homes in total (in 2025 the proposal was for 2,500 homes and KWT raised a concern that this would “not leave sufficient space for onsite mitigation”), but overall it remains the case that there is tentative support for Pedham Place in biodiversity terms, in order to reduce pressure for growth elsewhere locally or sub-regionally.
- 2.3.14. With regards to Scenarios 2 to 5, which would partially replace Pedham Place with select indicative omission sites, several of the sites in question are subject to limited biodiversity constraint, although there is a degree of concern with growth at Westerham⁵ and at Broke Hill a larger (more comprehensive) scheme could potentially add to concerns regarding fragmentation of a landscape associated with a significant density of ancient woodland and wider priority habitat woodland (e.g. mostly shown on historic mapping). Finally, at Kemsing the previous Interim SA Report in 2025 discussed how higher growth (i.e. the approach now assumed under Scenarios 3 to 5) could potentially allow for a strategic approach to planning for growth alongside green infrastructure.

⁵ At Westerham the assumption under Scenario 5 is four proposed allocations as per the assumed approach tested through the RA growth scenarios in 2023 and 2025. The following statement from the Interim SA Report published in 2025 still broadly holds true: “The ISA Report (2023) explained: “... there are biodiversity constraints to the north (including Westerham Wood SSSI and mature historic field boundaries), north west (Farley Common) and west (woodland priority habitat that would be impacted by any new road in this area, albeit this is not ancient woodland, nor is it shown on historic mapping). It is also recognised that Westerham is located at the head of the Darent Valley in between raised landscapes to the north and south associated with very high densities of valued ancient woodland, with Westerham Wood and Farley Common potentially acting as something of a stepping stone between these raised landscapes. [Overall] there is a need to take a strategic approach to growth at Westerham from a biodiversity perspective. It is noted that land to the east of the town is subject to low constraint.” It was also suggested that: “The potential to achieve some accessibility to Westerham Wood might be [explored].”

- 2.3.15. On balance it is not judged appropriate to conclude a preference for Scenarios 2 and 3 over Scenario 4 and 5, including because the former scenarios would involve generating significant unmet need which might then have to be provided for elsewhere within a constrained sub-region, but this conclusion is marginal.
- 2.3.16. With regards to significant effects, the conclusion of a 'moderate or uncertain' negative effect across all of the scenarios aligns with the equivalent conclusion reached in 2025. As per the conclusion reached in 2025, it is the case that a number of the 'constraint' allocations that feature across all of the scenarios are subject to biodiversity constraint *"most notably a cluster of sites north of Sevenoaks proposed to deliver strategic growth, but also Land South of Redhill Road, New Ash Green. Also, sites south of Kemsing..."*
- 2.3.17. In particular, KWT raised significant concerns with growth at Sevenoaks:
- "The comments and recommendations within this letter primarily relate to Regulation 18 allocation references SEV16, SEV18, SEV19, SEV21, SEV22, SEV24, and SEV25. Together with legacy permissions for developments at Sevenoaks Quarry and the former gasholder site these site allocations will result in significant impacts to critical green and blue infrastructure within the Sevenoaks Wildlife Reserve and on adjoining land through which flows the River Darent."*
- 2.3.18. However, the representation received from Natural England did not include a primary focus on biodiversity impacts, and in respect of the primary allocation of concern to KWT (Land north of Sevenoaks, west of Otford Road; 1,500 homes) stated:
- "This allocation also lies immediately adjacent Sevenoaks Gravel Pits SSSI.... As such, an assessment of any potential adverse impacts on the SSSI... will be required as part of any planning application. If necessary, the proposals should also include adequate mitigation measures, both during construction and operation..."*
- Furthermore, allocation of the land north of Sevenoaks would encompass the SSSI in urban development and thus could sever connectivity to the wider landscape for wildlife. It would also potentially risk development impacting on the River Darent, which runs through the site and is a chalk stream priority habitat, as well as its floodplain, with implications for surrounding habitat and the hydrologically connected SSSI. As such, we are pleased to see that the Development Brief has recognised the need for a 'Central Meadow Green' to provide an open naturalistic corridor between the SSSI and wider landscape, with multiple benefits for people and wildlife. Greater detailed assessment of this approach will be required by any planning application coming forward but we strongly advise that this is firmly integrated in any design work to ensure that adverse impacts via ecological network severance are avoided."*
- 2.3.19. Finally, with regards to allocations that are a 'constant' across the scenarios, it can be noted that a number of adjustments are made that are supported in biodiversity terms. In particular: at New Ash Green a significant allocation from 2025 is now an omission site (that does not feature across any of the scenarios) on biodiversity grounds;⁶ at Fort Halstead a site closely associated with ancient woodland is removed; and capacity is significantly reduced at Parkwood Hall Co-operative Academy, Beechenlea Lane, Swanley (previously proposed for 165 homes but now proposed for 100 homes).⁷
- 2.3.20. However, on the other hand, capacity has now been increased at several of the allocations retained from 2025, including the primary allocation at Kemsing which is shown by the national dataset to significantly intersect priority habitat. Also, the primary allocation at Hartley is now proposed for 190 homes, in contrast to 114 homes in 2025, and the Interim SA Report in 2025 stated:

⁶ It is associated with traditional orchard priority habitat located between two adjacent woodlands.

⁷ The Interim SA Report in 2025 stated the following in respect of land east of Swanley: *"Moving forward a green infrastructure strategy for the area might be considered accounting for assets including Swanley Park, Swanley Village, Parkwood Hall, the extensive 'Woods at Wilmington' LWS and Joydens Wood."*

“Hartley – shares similar characteristics to New Ash Green, with a high density of ancient woodland and wider woodland priority habitat surrounding the town reflecting historic land uses linked to geology and topography. The proposed greenfield allocation is overall subject to limited constraint, but sensitivities are adjacent to both the north and south, namely ancient woodlands, TPOs and an LWS. The site was woodland, as shown on historic mapping and aerial photography from the 1940s.”

- 2.3.21. Overall, there remain some significant biodiversity issues that warrant ongoing scrutiny such that it remain appropriate to predict a ‘moderate or uncertain’ negative effect. The following concluding statement from the appraisal in 2025 also still broadly holds true:

“... there are some significant site and settlement-specific biodiversity concerns over-and-above those raised through the equivalent appraisal in 2023. However, it is still not clear that significant negative effects will arise, even under a higher growth scenario involving NL sites. It remains the case that it is difficult to suggest a case for lower growth / generating unmet housing need from a biodiversity perspective.⁸ Finally, it is noted that the proposal is no longer to require 20% Biodiversity Net Gain (BNG), with the Officers Report feeding back on the 2023/24 consultation explaining: “Plan 2040 currently includes a policy option to seek 20% BNG, based on local evidence from KCC and the Kent Nature Partnership – this will be reviewed before the plan is finalised, including the impact on development viability.”

Climate change adaptation

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
=	=	=	=	=	=

- 2.3.22. A key consideration is the need to avoid development, in particular new homes, encroaching on fluvial flood risk zones, given worsened flood risk under climate change scenarios. Surface water flood risk is another consideration (of note in Sevenoaks given topography/geology including ‘dry valleys’) but this can often be dealt with through development management. Another consideration is down-stream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that development can achieve no net worsening of run-off rates.
- 2.3.23. The previous appraisal in 2025 flagged a potential concern across the growth scenarios ahead of consultation with the Environment Agency (EA). Subsequent the EA's consultation response did not raise any specific concerns relating to sites or spatial strategy, but did make the following recommendation:

⁸ The ISA Report (2023) stated: “With regards to growth quantum, the previous ISA Report (2022) concluded that “biodiversity is not likely to provide a strong argument for setting the housing requirement at a figure below LHN, subject to further work to consider potential development locations locally.” Having now begun the process of giving consideration to detailed site/settlement (supply) options, there is increased confidence in this conclusion. Neighbouring authorities to the east are broadly subject to lower biodiversity constraint than Sevenoaks District, but there are growth options within the district that give rise to limited biodiversity concerns.”

“We strongly recommend that the [Strategic Flood Risk Assessment, SFRA] is updated to incorporate [National Flood Risk Assessment data published in early 2025; ‘NaFRA2’] and reassess all newly allocated sites that are at flood risk now to ensure accurate, evidence-based decision-making and compliance with national policy. SFRA evidence exists but there is no transparent and clear link between the new site allocations and SFRA findings, specifically Level 2 SFRA coverage is unclear, which raises compliance risks for the new allocated sites in Flood Zones 2 and 3. Furthermore, Level 2 SFRA covers sites which are not anymore incorporated within the new site allocation list which might create confusion. Without these details, the Local Plan risks failing the Sequential Test and may permit development that increases vulnerability to flooding. We strongly recommend integrating the updated SFRA evidence directly into policies requirements and provide transparent site-level flood risk analysis to ensure compliance with national guidance and long-term resilience.”

- 2.3.24. At the time of writing a new SFRA has been published that does account for the new flood risk data (NaFRA2), explaining:

“Flood Zones 2 and 3a are based on the Environment Agency’s Flood Map for Planning (the latest flood maps, derived from the NaFRA2 study and which are available from DEFRA data services have been used)... Flood Zone 3b has been based on... detailed modelling, where this is available... In areas not covered by detailed modelling, the Environment Agency’s Flood Map for Planning 3.3% AEP defended flood risk extents - present day (taken from the latest NaFRA2 data from the DEFRA data services) has been used to define Flood Zone 3b.”

- 2.3.25. At the time of writing an updated Level 2 SFRA is not available, nor are site-specific policies; however, what is available is a Sequential Test and Exception Test Report (June 2026), which considers those emerging proposed allocations (Scenario 1) that significantly intersect either a fluvial or a surface water flood zone.

- 2.3.26. The Report flags six sites as most constrained such that the Exception Test is required:

- Land north of Sevenoaks, west of Otford Road (1,500 homes; 106.5 ha) – a strategic urban extension to Sevenoaks, where past SA work has flagged flood risk constraint.
- Land at Breezehurst Farm, Crouch House Road (450 homes; 17.9 ha) – a strategic urban extension to Edenbridge, where past SA work has flagged flood risk constraint.
- Land south west of Skinners Farm, Edenbridge (155 homes; 8.3 ha) – a strategic urban extension to Edenbridge, where past SA work has flagged flood risk constraint.
- Land west of Brittain’s Lane, Sevenoaks (56 homes; 5.3 ha) – an urban extension to Sevenoaks previously proposed for 65 homes.
- Abacus Furniture, Farm Road Garages, Sevenoaks (11 homes; 0.2 ha) – an urban site in Sevenoaks previously proposed for 10 homes.
- 78-80 and 82-84 High Street, Leathermarket, Edenbridge – a small urban site previously proposed to deliver 14 homes but now not expected to deliver homes.

- 2.3.27. For each of these sites the Report concludes that the Exception Test is passed including because at five of the sites there is the potential to avoid flood risk via site layout. The exception the final site listed above, but concerns here are allayed because the proposal is not to rely on this site to deliver new homes (but new homes as part of a mixed use scheme would be supported as windfall if appropriate in flood risk and wider respects). For this site the Report concludes: *“A site-specific Flood Risk Assessment will be required at planning application stage. This will inform the detailed layout and identify the mitigation measures needed to ensure the development can be made safe for its lifetime without increasing flood risk elsewhere. This will include applying a sequential approach within the site to locate the most vulnerable uses in the areas of lowest flood risk where feasible, alongside establishing appropriate finished floor levels, ensuring safe access and egress, and identifying surface-water management measures.”*

- 2.3.28. However, a further consideration is 12 sites that are not subjected to the Exception Test because the issue affecting the site is only surface water flood risk, with the Report stating for each of these sites: *“Significant surface water flood risk is identified and will be addressed at planning application stage.”* This approach warrants scrutiny because surface water flood risk can have implications for site layout / masterplanning and the need for Sustainable Drainage Systems (SuDS) and, in turn, have implications for site capacity and viability. Several of these are urban sites, and it is important to consider whether an existing low intensity use could partly reflect understanding of flood risk.
- 2.3.29. A key site of note is Land at Cramptons Road, Sevenoaks, which is now proposed for 143 homes having previously been proposed for 50 homes in 2025. Alongside a centrally located area of surface water flood risk there are also some mature trees and adjacent to the site is a rail line and industrial buildings, hence site capacity warrants ongoing scrutiny. However, it is a PDL site (albeit mostly open land and shown as such on historical mapping and imagery) located in proximity to Bat and Ball Station and it is anticipated to deliver in full within the first five years of the plan period, which are considerations that would factor in were it to be subjected to the Exception Test.
- 2.3.30. Finally, with regards to Scenario 1, it is noted that one proposed allocation from 2025 has now been removed on flood risk grounds, namely a car park at Westerham (6 homes), in respect of which the Interim SA Report in 2025 suggested that the site *“may have historically been used for car parking in the knowledge that there is flood risk.”*
- 2.3.31. Having discussed Scenario 1, the following points consider the alternative scenarios:
- Most of the variable growth locations – are subject to limited flood risk constraint.
 - Edenbridge – is broadly sensitive in flood risk terms,⁹ but the assumed strategic urban extension to the north under Scenarios 2 to 6 generates limited concerns. The site could be bounded to the north by a stream (although streams do not always represent strong boundaries) and whilst there is a centrally located surface water flood risk channel this could likely be integrated as part of a green/blue infrastructure strategy.
 - Westerham – is also associated with a degree of flood risk; specifically, a small stream that follows the Croydon Road with properties potentially subject to flood risk downstream. Previous proposals for strategic growth (from 2018) proposed enhancements to the stream corridor, but it is not clear what could be achieved in practice, e.g. in terms of strategic flood water attenuation.
 - Unmet need – the Interim SA Report in 2025 explained: *“... as discussed within previous Interim SA Reports from 2022 and 2023, flood risk is a significant constraint to growth within neighbouring... areas to the east... such that there is a clear argument for Sevenoaks District not generating unmet need (albeit where any unmet need would be provided for is unknown and flood risk is a very localised / site specific issue).”*
- 2.3.32. In conclusion, it is not possible to differentiate between the growth scenarios, and at this stage a neutral effect is predicted. However, it is acknowledged that the latest site allocations, site capacity figures, site specific policies and flood risk-related evidence will need to be further scrutinised by the Environment Agency ahead of submission.

⁹ The Interim SA Report in 2025 stated: *“... Edenbridge warrants being a focus of attention here, as the town is associated with a low lying vale landscape and integrates closely with a series of fluvial flood risk zones. There is a high proposed growth strategy (and the possibility of further growth still can be envisaged, as discussed in Section 5.4) and whilst there will be every potential to avoid / mitigate flood risk, including accounting for downstream flood risk affecting existing areas of built form within the town, this requires careful consideration.”*

Climate change mitigation

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
1	2	2	2	1	1

- 2.3.33. The discussion here focuses on per capita greenhouse gas emissions from the built environment, mindful that alignment of the reasonable alternative growth scenarios with strategic transport objectives is a focus of discussion under other topic headings. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on sites well suited to delivering 'net zero development' (which should be onsite, if at all possible, i.e. without having to resort to offsetting).
- 2.3.34. Larger developments can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks or otherwise design-in innovative energy infrastructure including battery storage. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny (including at the masterplanning stage), and housebuilders will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, particularly because large sites can face viability challenges due to the need to deliver major infrastructure upgrades. Also, heat networks are difficult to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be sourced (e.g. a watercourse).
- 2.3.35. It can be suggested that the most important factor is simply directing growth to locations and sites with the strongest viability credentials, recognising that there are typically many policy 'asks' of developers over-and-above decarbonisation / net zero development. This can mean medium-sized greenfield sites.
- 2.3.36. Another important consideration is then around ensuring that 'net zero development' is carefully defined. There are perhaps three key points to make:
- Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort.
 - Secondly, there are two broad approaches to calculating performance / evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an energy-based approach, with strong support amongst specialists for the latter approach, and the potential to require this approach recently having been confirmed through a legal case following a Written Ministerial Statement in 2023 (discussed [here](#)), although the Draft NPPF (2025) proposes to remove the potential once again.
 - Thirdly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use, but there is also a need to consider the 'whole life cycle' of a development, to include construction, retrofitting and demolition.
- 2.3.37. Taking the scenarios in turn:

- Scenario 1 – the baseline allocations include a significant focus on urban and PDL sites that could face challenging development viability (the changes to urban/PDL allocations over the years is evidence of this) such that it is difficult to deliver the full policy quota of affordable housing (indeed, it is not unusual for challenging urban sites to deliver no affordable housing), let alone the full quota of affordable housing alongside the achievement of built environment decarbonisation standards that go beyond the minimum requirements set out in building regulations. However, there are also numerous small and medium sized greenfield sites likely to have strong viability (including at villages) plus there are several strategic urban extensions where there may be the potential to put built environment decarbonisation at the heart of the vision.

A specific consideration is the following recommendation from Interim SA Report (2023): *“Consideration should be given to the potential to deliver a fifth generation heat network at the key urban regeneration sites / areas including Sevenoaks Station.”*

- Scenarios 2, 3, 4 and 5 – these scenarios see Pedham Place partially replaced with indicative omission sites. With regards to Pedham Place, the following statement from 2023 and 2025 still broadly holds true:

“Pedham Place... could represent a built environment decarbonisation opportunity. However, this is uncertain at this stage ahead of further work around funding and viability, including taking account of the costs... in respect of... infrastructure.”

The latest situation is that the Pedham Place site promoter states that homes will align with the national ‘future homes standard’ such that they will be ‘zero carbon ready’, which specifically means that they will be zero carbon once the national grid fully decarbonises, but a preferable approach is for homes to be zero carbon now. Also, the site promoter states: “Approaches to delivering net zero homes may allow opportunities to support offsetting through developing relationships with existing decarbonisation projects in Sevenoaks.” This is potentially concerning in that offsetting sits at the bottom of the energy hierarchy (i.e. net zero should be achieved onsite where at all possible), and overall there is a need for further clarity.

With regards to the indicative omission sites, most are likely to benefit from strong development viability, e.g. Westerham is likely a location with strong development viability including relating to high need / demand. At Broke Hill a larger and more comprehensive scheme (1,400 homes is assumed) could feasibly lead to a per capita decarbonisation opportunity over-and-above the Scenario 1 approach (741 homes).

- Scenario 6 – as per the conclusion reached in all three of the previous Interim SA Reports, there is support for providing for LHN in full / not generating unmet need from a decarbonisation perspective, both in terms of the built environment and transport.

2.3.38. In conclusion, at this stage it is considered appropriate to flag a concern with the lower growth scenarios that would: A) generate unmet need and/or hinder the potential to put in place a robust supply headroom over the housing requirement such that the District risks facing the presumption in favour of sustainable development; and B) fail to direct growth to locations that may represent a built environment decarbonisation opportunity.

2.3.39. With regards to significant effects, the Interim SA Report in 2025 predicted a ‘moderate or uncertain’ negative effect in alignment with the conclusion from 2023:

“... whilst all scenarios would likely see an improvement on the baseline (a situation whereby growth comes forward in the absence of a Local Plan, whether that be in Sevenoaks or elsewhere in order to address unmet need from Sevenoaks), there is a need to reach conclusions taking account of established objectives and targets, in particular the district’s climate change commitment... It is hoped that it will be possible to predict significant positive effects at the next stage; however, at this current stage, there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection to an extent that reflects the urgency of the issue... There is a need for further work...”¹⁰

¹⁰ The Council’s net zero commitment does not strictly set a district-wide net zero target date, but the level of ambition is clear (N.B. many of the District’s neighbours have set 2030 as an area-wide net zero target date, as set out [here](#)).

- 2.3.40. At the current time it remains appropriate to predict a ‘moderate or uncertain’ negative effect. As part of this, it is noted that the proposal is not to require standards of built environment decarbonisation through development management policy that go beyond the minimum requirements set out in Building Regulations, which is an approach taken by numerous local authorities nationally (e.g. Swale), albeit there are implications for development viability (and, in turn, funds available to deliver on wider objectives including affordable housing) and the Draft NPPF may prevent ‘local standards’. Also, it is difficult to suggest that the following recommendation from 2025 has fed in strongly: *“There is a need for further work to ensure that decarbonisation opportunities (including built environment) are realised via strategy / site selection.”*

Communities

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
	2	2	2	2	2

- 2.3.41. There are wide ranging issues / opportunities that might be explored under this topic heading, but a key matter that warrants being a focus is secondary school capacity.
- 2.3.42. In this regard there is support for Pedham Place (Scenarios 1 and 6), which could deliver a new school. Also, at Edenbridge there is land safeguarded for a secondary school with delivery contingent on demand and funding, such that there could be merit to higher growth (Scenarios 2 to 6); however, it is likely that the school could be delivered under Scenario 1. The Draft Infrastructure Delivery Plan (IDP, 2026) explains:
- “Secondary provision across Sevenoaks District is currently assessed as sufficient based on demographic forecasts and committed development, and no new secondary capacity is planned at present. However, this position does not include growth that may be identified through the Local Plan. KCC has advised that existing secondary schools in the District have limited potential for expansion, and that any significant increase in demand arising from new Local Plan allocations would require new provision. In particular, large-scale development at Pedham Place would necessitate a new secondary school on site, while a safeguarded site in Edenbridge could only be brought forward if sufficient new housing were planned to make a school financially viable. Secondary planning for the District is therefore contingent on the scale and location of future allocations in the new Local Plan.”*
- 2.3.43. Primary school capacity is also a key issue, and under Scenario 1 the IDP (2026) explains that growth will deliver 7 new primary schools as well as two extensions (from 1fe to 2fe), and this includes two primary schools at Pedham Place.

- 2.3.44. With regards to the omission sites that feature across Scenarios 2 to 6, it is unclear whether the ~600 home site at Edenbridge would deliver a primary school, but a more comprehensive scheme at Broke Hill (~1,400 homes) would certainly be able to deliver a primary school (under Scenario 1 the anticipated small new settlement at Broke Hill would deliver accessibility improvements to Halstead Primary School).¹¹
- 2.3.45. The other omission sites are smaller and so would not directly deliver new primary school capacity, but neither are there known to be any existing local capacity constraints (nor are any local schools known to be under capacity such that they are at risk of closure, which is increasingly an issue nationally).
- 2.3.46. Capacity at healthcare facilities is a further key issue and, in this regard, there is clear support for Pedham Place (Scenarios 1 and 6). It is inherently challenging to plan for healthcare capacity alongside housing growth, but the IDP (2026) explains: *“We have engaged closely with NHS ICB on the proposed sites and the demands on health infrastructure they would create. To support our proposed growth... [Pedham Place will deliver a new]... primary and community healthcare facility.”* Further information is also presented by the site promoter [here](#), where they explain:
- “It is projected that development at Pedham Place will generate a need for around 4 GPs and 3-4 Dentists. Further development in the local area will likely generate a need for 2 GPs and 1-2 Dentists irrespective of Pedham Place's delivery. In the local area, our assessments show that most GPs are oversubscribed, having significantly more than 1,800 patients per GP [a map is provided]. Pedham Place will deliver a health hub or GP surgery in its Local Centre which will provide for the needs of the local community but also to act as a place-making tool to increase activity in the centre. The health hub can be sized... [potentially] to also help meet wider local health needs.”*
- 2.3.47. Also, with regards to healthcare facilities, the IDP explains that Edenbridge benefits from a modern high quality facility,¹² but it is difficult to suggest this as a significant factor in support of higher growth (Scenarios 2 to 6). At the other variable growth locations there are no clear issues or opportunities in respect of healthcare infrastructure, although a more comprehensive scheme at Broke Hill could feasibly deliver a new facility.
- 2.3.48. Final considerations to enable differentiation between the scenarios are as follows:

- Pedham Place (Scenarios 1 & 6) – in addition to the merits of the scheme in terms of education and healthcare, as discussed above, the previous Interim SA Report in 2025 suggested *“there is also a green/blue infrastructure opportunity to explore noting that the nearby river corridor is not currently accessible.”* The latest situation is that the scheme can deliver 55ha of greenspace, and the emerging vision also includes green corridors radiating out and providing attractive walking and cycling connections.

A further matter at the heart of the vision for Pedham Place is ensuring that it develops as a “large village” that does not detract from Swanley town centre regeneration.

Finally, in respect of Pedham Place, the previous Interim SA Report suggested a potential opportunity relating to the proposal to also deliver a new Wasps Stadium nearby to the west; however, the latest situation is that a new stadium is not a proposed allocation.

¹¹ The Interim SA Report in 2025 explained: *“... the 800 home Broke Hill Golf Course scheme that was previously refused at appeal included a single form entry primary school and also Specialist Resource Provision (SRP). The appeal decision noted: “Given the size of the scheme, the primary school would be an essential component but the inclusion of the SRP would be of particular benefit to the district.” However, single form primary schools can be challenging to run viably, with it often the case that there is a preference for two form entry schools. At the current time there is a degree of uncertainty regarding what could be delivered in terms of primary school capacity and wider community infrastructure and, whilst it is noted that there is now the potential to deliver a larger new settlement... there are three separate landowners which could create a challenge...”*

¹² Edenbridge Memorial Health Centre is a modern, purpose-built facility bringing multiple services under one roof, including GP services, community services, outpatient clinics and a wellbeing centre. The wellbeing centre is a hub for health and social care collaboration, promoting self-management, prevention and health optimisation. Together, the centre and its wellbeing hub function as an integrated local resource, reducing the need for residents to travel to acute hospitals for routine care.

- Edenbridge – the IDP (2026) also discusses a commitment to refurbishing Edenbridge Leisure Centre, at a cost of £25m with funds to come from developer contributions (S106) and Council funds, which contrasts to the committed refurbishment of Sevenoaks Leisure Centre, where the funds will also come from the Community Infrastructure Levy. This suggests a possible growth related opportunity. However, at Edenbridge it is not clear that land to the north of the town is the optimal location (in communities terms) for an additional allocation to deliver higher growth, given options to build on existing and proposed growth locations in other directions aimed at ensuring comprehensive schemes that avoid issues and realise opportunities (i.e. maximise planning gain) including in terms of a green/blue infrastructure strategy.
- Westerham (Scenario 5) – there is potentially a strategic growth opportunity to explore, as discussed in the Interim SA Reports published in 2023 and 2025:

“... it is recognised that concerns have been raised with proposals for growth to the north (and east) of the village in the past. There is no clear suggestion that growth could be of a scale to deliver a secondary school, but growth to the north of the village would benefit from proximity to the large village primary school, and it may be that growth is able to support the school in some way and/or support the delivery of new community infrastructure alongside the school (e.g. a new ‘community hub’).”

- Swanley and Hextable – are closely related and the previous Interim SA Report commented as follows regarding the proposed approach at the time (current Scenarios 2 to 5): *“... as discussed in Section 5.4, there is a need for further work aimed at ensuring a strategic approach to growth with a long term perspective, including aimed at delivering community infrastructure, including new schools capacity, and maximising planning gain in the broadest sense. Strategic urban extensions must also be considered in the context of needing to support town centre regeneration and also in the context of proposed (Wasps Stadium) and potential (Pedham Place) strategic growth to the south of the town. There is also potentially a growth related opportunity around developing/delivering a green infrastructure strategy.”* A specific concern with higher growth at Swanley relates to further eroding the landscape gap to Swanley Village, whilst at Hextable settlement separation is also an issue and there would be an inherent challenge in respect of ensuring an optimal scheme that maximises the benefits of growth, in that this could necessitate a cross-border scheme with Dartford.
- Scenarios 2 to 5 – there would be a concern regarding secondary school capacity in the north of the District. Also, it is noted that through the consultation in 2023 KCC stated: *“KCC Education would prefer the development of areas of the district where the combined quantum of development sites will more adequately support the future development of education infrastructure whereas small, disparate development sites can lead to difficulties in the planning and development of education infrastructure.”*
- Scenarios 2 to 6 – the reality is that there could be concerns regarding high growth at settlements, namely Edenbridge, Swanley (particularly under Scenario 6), Hextable, Kemsing, Broke Hill (which is not currently a settlement but relates closely to Halstead and Pratts Bottom) and Westerham. At most of these settlements higher growth was a focus of the consultation in 2025 (all bar at Broke Hill and Westerham, where the current higher growth options were indirectly consulted on via the Interim SA Report) and concerns were raised. For example, at Hextable and Kemsing there are concerns regarding impacts to village and it is difficult to pinpoint significant growth related opportunities other than in respect of the provision of new homes (including affordable homes). At Broke Hill a larger scheme would deliver additional benefits, but would bring the new settlement much closer to the existing village of Pratts Bottom.

- Higher growth – as well as avoiding unmet need, which would increase pressure on communities elsewhere in the sub-region,¹³ higher growth could help to ensure that the Local Plan is able to identify a healthy ‘supply buffer’ over-and-above the housing requirement, such that there is confidence in the housing requirement being delivered annually (in particular, confidence that the Council can maintain a five year housing land supply) such that the Local Plan remains ‘up to date’ and the District is not subject to the presumption in favour of sustainable development (NPPF paragraph 11). Under ‘the presumption’ (or ‘tilted balance’) development tends to come forward in a relatively piecemeal way that is sub-optimal in terms of strategic planning for communities.

2.3.49. Further considerations regarding aspects of the strategy/supply that are held constant across the growth scenarios include the following:

- Sevenoaks – strategic growth to the north should represent a good opportunity to deliver strategic community infrastructure alongside new homes, but there are also a range of wider factors that will need to feed into masterplanning including around planning for biodiversity and flood risk, which could limit what can be achieved. The new higher growth strategy to the west of the town is supported in that the proposed allocations are both relatively well linked to the town centre and rail station.
- New Ash Green – the village is proposed high growth and so the Interim SA Report in 2025 highlighted “a need to ensure a strategic focus on maximising benefits to the local community”. The proposal is to deliver a new 2fe primary school.
- Hartley – the Interim SA Report in 2025 stated: “the importance of ensuring a strategic approach to growth to the west has been discussed above. Another consideration is proposed new homes adjacent to the railway line, and these sites also appear to be constrained in access terms given a narrow railway bridge with a very narrow footway. Finally, at Hartley there is a need for careful consideration delivery assumptions at HART2 Land at Brambledown and Wellfield, which involves an estate regeneration (40 homes is assumed).” The latest situation is that previous allocation HART2 is removed. Finally it should be noted that the IDP (2026) states that for New Ash Green and Hartley: “... the NHS ICB will need to carry out a review of primary and community healthcare capacity to accommodate additional patient demand.”
- Otford – the Interim SA Report in 2025 stated: “the proposed extension to the west of the settlement is around 1.5km from the primary school and there is a need to confirm the potential for safe vehicular access to the site and good walking / cycling links between the site and the village. The site is adjacent to a recreation ground and it is also noted that there appears to be... capacity at the primary school (see data [here](#)).”
- West Kingsdown – the Interim SA Report in 2025 stated: “... with the new proposed allocation added to the strategy since 2023 the potential for coordinated growth to the east to develop this part of the settlement as a community hub and potentially even deliver a new local centre is very apparent. The new proposed allocation is adjacent to the local primary school, although it is noted that there appears to be limited spare capacity.” In 2025 the Interim SA Report tested higher growth to the east with a view to potentially realising the local centre opportunity to the fullest extent; however, in practice it is not clear that there is any particular opportunity to be realised.
- South Darenth – the Interim SA Report in 2025 stated: “... one of the proposed allocations is flagged in Section 5.4 as not relating very well to the settlement and there is no primary school in walking distance.”

¹³ The previous Interim SA Reports discussed the theoretical possibility of unmet need being provided for at strategic growth locations elsewhere, but no such opportunities have materialised in practice. The situation could change in the future following Local Government Reorganisation (LGR) and Devolution (i.e. in light of a Spatial Development Strategy, likely covering all of Kent) but these changes to the planning system remain some way off, and there is an urgent need to adopt a Local Plan.

- Villages & clusters – the Interim SA Report in 2025 stated: “... the primary consideration is around the potential to deliver a primary school at Chiddingstone Causeway, plus the proposal to deliver 40 homes at Noah’s Ark, which is a ‘cluster’ in the settlement hierarchy, is questionable from an accessibility perspective. Elsewhere the village allocations potentially generate limited concerns and could potentially be associated with some benefits to the village, e.g. in terms of maintaining schools rolls and potentially village vitality in general. At Fort Halstead additional growth might help with securing a primary school.” The latest situation is that the quantum of growth directed to Chiddingstone Causeway is reduced considerably, and there is also lower growth directed to Noah’s Ark and Fort Halstead (where a new school is still expected).

- 2.3.50. In conclusion, in some respects the equivalent conclusion from the Interim SA Report in 2025 still holds true. At that time the conclusion was strong support for Pedham Place but concerns regarding what at the time was a much higher growth strategy for a number of settlements relative to the previous proposal in 2025. The Interim SA Report in 2025 recommended “a need for further work to understand community infrastructure issues and opportunities”, but in practice it is difficult to pinpoint significant growth related opportunities (in terms of community infrastructure or wider planning gain) that might be realised via higher growth across most of the settlements that are now a variable across the growth scenarios, and at all of these settlements higher growth would likely generate local community concerns. It is important to acknowledge that higher growth at some settlements could help to ensure that the plan progresses to adoption and that the plan is successfully implemented, thereby minimising the risk of future suboptimal piecemeal growth under ‘the presumption’. However, on balance, there is judged to be strong support for Scenario 1, which is the outcome of repeated consultation and ongoing engagement.

Economy & employment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester’m	+ Edenbridge
★	2	2	2	2	★

- 2.3.51. The equivalent appraisal in 2025 concluded significant positive effects across all of the growth scenarios and was not able to differentiate between them in terms.
- 2.3.52. At the current time there is greater clarity regarding employment land needs and the proposed approach to responding to needs through the plan; specifically, there is a need for allocations to deliver around 40,000 m² of new employment floorspace and the proposal is for allocations to deliver around 113,000 m².
- 2.3.53. This represents a proactive approach, and there is little reason to suggest any concerns regarding ‘oversupply’, e.g. leading to problematic commuting patterns. As explained within the current plan document:

“The [need figure is] based on a jobs growth-based scenario. However, in response to feedback received at various stages of the plan-making process, an alternative housing growth-based scenario was also tested, linked to the retention of the current jobs-to-worker ratio in the District. This scenario identified a higher level of potential need, broadly aligned with the scale of employment land being [proposed].”

- 2.3.54. The latest situation is that the new Wasps Stadium is no longer proposed for allocation, and also it is noted that an office building next to Sevenoaks Station is now proposed for residential, with the context being that the office market *“is under severe pressure from residential conversions which, if all currently consented proposals were implemented... would result in a net loss of office floorspace.”* However, there is notably a new proposed allocation at the Vestry Estate, which is the District’s primary employment area located at the northern edge of Sevenoaks, which should ensure a suitably comprehensive approach to growth, i.e. ‘complete’ expansion of employment area.
- 2.3.55. With regards to Pedham Place, whilst the previous Interim SA Report was unclear on its strategic importance in terms of employment land, its importance is now potentially increased given the new proposal not to allocate land for a Wasps Stadium, and the current plan document explains that it: *“...represents a unique, strategic opportunity to deliver a sustainable mixed-use development incorporating new homes alongside employment land in a location identified for growth in the [Employment Needs Study].”* The Interim SA Report in 2025 further stated: *“New employment land at Pedham Place is likely supported recognising that this part of the District is well linked to London, the Thames Gateway and elsewhere via the M25 and M20.”*

Historic environment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
★ 1	2	2	2	2	★ 1

- 2.3.56. The equivalent appraisal in 2025 raised limited concerns and overall concluded support for higher growth scenarios, which would involve directing growth to locations with relatively limited historic environment constraint in the sub-regional context. Historic England did not comment on spatial strategy or site selection through the consultation (nor through the previous consultation in 2023),¹⁴ but did highlight a need for further evidence gathering. At the current time key considerations are:

- Scenario 1 – a number of adjustments are made to the package of sites that are held constant across the growth scenarios, including with capacity at several sites adjusted upwards or downwards, with some implications for historic environment objectives. See further discussion below.
- Scenario 2 – Pedham Place (which does not feature under Scenarios 2 to 5) does have a degree of sensitivity, with the previous Interim SA Report explaining: *“Firstly, Fort Farningham scheduled monument is onsite (there would presumably be the potential to preserve this...). Secondly, there are two nearby historic villages strongly associated with the River Darent corridor, namely Farningham and Eynsford. There is a need to undertake work to explore potential ways of avoiding Sevenoaks-bound traffic through these villages (particularly Eynsford).” Both of these villages have tight historic cores with a high density of listed buildings including grade 1 listed churches (Halstead is less sensitive).”* However, it is important to put weight on the fact that Historic England has not raised concerns through consultation.

¹⁴ The Consultation Report in 2024 explained: *“HE welcome the inclusion of policies for the historic environment... but that all policies through the plan should be tested to consider their impact on heritage assets. The response refers to the potential use of masterplans/briefs for major sites and development management policies for assets. No specific plan-related comments.”*

With regards to Edenbridge (which sees higher growth under Scenarios 2 to 6), the assumed additional allocation to the north is subject to limited constraint. However, there is a degree of concern in respect of higher growth at Swanley (Scenarios 2 to 5), as the assumption is larger scheme to the east that would further close the gap to the Swanley Village Conservation Area, although there is also a case to be made for a comprehensive masterplanned approach to growth in this area, i.e. one that minimises the risk of suboptimal development creep over time.

- Scenario 3 – higher growth at Hextable gives rise to limited concerns,¹⁵ but the assumed additional growth location at Kemsing is notably constrained by the nearby conservation area, including accounting for traffic. Having said this, there is a case for a comprehensive masterplanned approach to expansion of the village to the south, as part of which steps could be taken to minimise impacts to the conservation area.
- Scenario 4 – the Interim SA Report in 2025 explained the following in respect of the option of a larger new settlement at Broke Hill (i.e. a ~1,400 home new settlement as opposed to the smaller new settlement assumed under Scenarios 1, 2, 3 and 5): “... *there are limited concerns... assuming steps taken to avoid traffic through or creep/sprawl towards Halstead Conservation Area.*”
- Scenario 5 – Westerham is sensitive in historic environment terms, and in respect of possible higher growth the Interim SA Report in 2025 stated: “... *one of the sites is close to a cluster of historic buildings including one that is listed, and another of the sites is adjacent to an area of registered common land; however the largest of the sites gives rise to limited concerns other than in terms of traffic through the town centre conservation area, where traffic congestion is already a significant issue.*”
- Scenario 6 – again it is important to say that there is a case for higher growth in terms of avoiding unmet need (in the context of a constrained sub-region) and ensuring that the plan progresses to adoption and with ensure a healthy supply headroom. The previous Interim SA Reports have explored the matter of growth quantum in detail.¹⁶

2.3.57. Further considerations regarding the baseline sites/strategy (Scenario 1) include:

- **Sevenoaks** – the situation is broadly as per 2025, when the Interim SA Report stated: “... *the previous Interim SA Report (2023) explained: “the allocations that are a constant across the growth scenarios mostly give rise to limited concern, from a historic environment perspective, with key considerations: Land adjacent Seal Hollow Road (16 homes) is adjacent to Grade I listed Knole Park; Land east of the High Street is clearly a sensitive town centre site; and there are also historic environment considerations in the vicinity of the Vestry Estate, where there are two modest proposed employment allocations.” The first of these sites is now no longer supported by the SHELAA / proposed for allocation, the second site is a town centre site that now has the benefits of having been consulted on, in terms of capacity and design considerations, and concerns regarding growth adjacent to the Vestry Estate are of limited significance (discussed in Box 5.3). With regards to new proposed allocations since 2023, none are flagged in Section 5.4 as being subject to particular constraint, but in-combination effects are a consideration, including in terms of traffic.*”
- **Swanley** – the Interim SA Report in 2025 stated: “*the new proposed higher growth strategy gives rise to a degree of tension with historic environment objectives, albeit overall Swanley has relatively limited constraint. In particular, strategic growth to the northeast would erode the gap to Swanley Village and SWAN12 has a degree of sensitivity.*”

¹⁵ The Interim SA Report in 2025 stated in respect of Hextable: “... *whilst there is overall limited constraint, including as evidenced by the lack of a conservation area, this is an area that had begun to see development by the early 20th century. Locally listed Swanley Park is a factor that should feed into growth strategy for Swanley / Hextable.*”

¹⁶ The Interim SA Report in 2025 stated: “... *there is no clear case for exporting unmet need from a historic environment perspective.*” The Interim SA Report in 2023 stated: “*With regards to growth quantum, the previous ISA Report (2022) considered the distribution of historic environment designations across the sub-region, before concluding: “... several settlements in the district are subject to relatively low historic environment constraint, and those parts of the district falling outside of the NL are overall subject to limited or moderate constraint (with some exceptions, notably the River Darent corridor in the far north), such that historic environment objectives are not likely to be a significant barrier to setting the housing requirement at LHN.” This conclusion potentially still broadly holds true, in light of the consideration of site and settlement options...*”

- **Edenbridge** – the Interim SA Report in 2025 stated: “... whilst there is a need to carefully consider high growth at Edenbridge from a range of perspectives there are limited concerns in historic environment terms. Of the proposed directions for strategic expansion it is land to the west where there is a need to account for encroachment towards listed buildings, including a notable cluster at Skeynes Park. A further consideration is the more modest proposed expansion to the south in proximity to the town centre conservation area, and the potential for the land to contribute to the setting of the conservation area can be envisaged, as this is an expansive low-lying landscape associated with the River Eden, and a footpath does pass through the site. However, there are few listed buildings in the vicinity, and the potential to secure a strong Green Belt boundary might be envisaged that minimises the risk of future development creep/sprawl to the south.” The site to the south now has permission.
 - **New Ash Green** – the Interim SA Report in 2025 stated: “... whilst there is overall limited historic environment constraint, as a largely 20th century settlement, there is a clear concern with strategic expansion to the south, as discussed in Section 5.4. This is a clear case of needing to confirm site specific policy / masterplanning principles.” The latest situation is that the site capacity is reduced by 50 homes.
 - **Otford** – the Interim SA Report in 2025 stated that the village “... is sensitive in historic environment terms, but the proposed allocation is distant from the historic core. Impacts to a historic lane are potentially a consideration (discussed further below).”
 - **Hartley** – the Interim SA Report in 2025 stated that the village “... has overall limited constraint, similar to New Ash Green, and the main proposed growth location appears to be unconstrained in historic environment terms.”
 - **West Kingsdown** – the Interim SA Report in 2025 stated “... again this is mostly a 20th century settlement, but there is some historic environment sensitivity... in proximity to proposed growth locations. The new proposed allocation since 2023 warrants scrutiny given it will take the built form towards the cluster of historic buildings, including a grade 1 listed church, associated with Church Wood (see historic mapping).”
 - **Eynsford and Seal** – the Interim SA Report in 2025 stated: “... the proposed low growth strategy is supported.”
 - **Pratts Bottom** – the Interim SA Report in 2025 noted that the village “... is not proposed any allocations despite low historic environment constraint, but it is acknowledged that there is the option of a linked new settlement at Broke Hill...”
 - **South Darenth** – the Interim SA Report in 2025 stated: “this was a significant settlement by the early 20th century (see historic mapping) with built form extending well beyond the current conservation area, but the proposed approach of expansion south of the railway generates few concerns.”
 - **Villages & clusters** – the Interim SA Report in 2025 stated: “... as discussed in Section 5.4, the key issue is potentially growth at Chiddingstone Causeway, where there would be a clear risk of impacts to the setting of a grade 2* listed church.” The latest situation is that the proposed growth strategy is reduced significantly.
- 2.3.58. Finally, with regards to **archaeology**, the Interim SA report in 2025 stated: “... it has only been possible to account for nationally designated scheduled monuments, but it is recognised that there will be a need to account for wider archaeological constraint at the next stage. Any guidance from Historic England would be welcomed, as it is difficult to know how to treat known or potential archaeology as a constraint to local plan spatial strategy / site selection (outside of scheduled monuments, which are a clear constraint to development).” Subsequently Historic England did not comment on strategy/sites, but did state support for the proposed development management policy on archaeology. Kent Council proposed some adjustments to the policy with a view to ensuring a focus on preservation in situ where possible.

2.3.59. In conclusion, in some respects the conclusion from 2025 still stands:

“... there are overall limited concerns despite the new proposed higher growth strategy given the sites selected / spatial strategy supported, with a good proportion of growth directed to settlements with limited historic environment sensitivity. However, there will clearly be a need for further work to develop site-specific policy aimed at demonstrating that sites can viably deliver in a timely fashion (i.e. in accordance with the committed trajectory). It is difficult to suggest support for a lower growth strategy, as unmet need might have to be provided for elsewhere in a constrained sub-region and/or there could be issues with delivering the committed housing requirement leading to the presumption in favour of sustainable development. Also, it can be noted here (albeit also applicable under other headings) that a low growth strategy could lead to a challenge with adopting the plan and, in turn, a continuation of the baseline situation whereby growth comes forward under the ‘presumption’.”

2.3.60. However, in light of latest understanding there is a degree of concern with certain of the omission sites that it is assumed would be allocated under Scenarios 2 to 5, hence there is a preference for Scenarios 1 and 2. With regards to significant effects the conclusion is an overall ‘neutral’ for all of the scenarios, as per the conclusion in 2025.

Homes

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
3	6	5	4	2	1

2.3.61. Under Scenario 1 supply currently falls slightly short of local housing need (LHN) over the plan period as a whole, but this situation could improve in light of future monitoring data, i.e. if it is the case that sites that currently do not feature in the supply gain planning permission under the presumption in favour of sustainable development.

2.3.62. Nonetheless there is a case for higher growth from a perspective of providing for LHN.

2.3.63. Firstly, this is because the current supply would necessitate a heavily ‘stepped’ requirement (i.e. the number of homes that the Council commits to delivering), i.e. one whereby the requirement is set below LHN in the early years of the plan period and then commensurately above LHN in the latter years. This issue could be somewhat remedied by additional allocations that would deliver earlier in the plan period, which typically means smaller and medium-sized greenfield sites.

2.3.64. Secondly, additional supply could allow for a healthy supply ‘headroom’ over-and-above the housing requirement as a contingency for delivery issues, i.e. with a view to ensuring that the Council can maintain a five year housing land supply, at least in the early years of the plan period ahead of a new local plan. The fact that delivering LHN would mean more than quadrupling recent rates of housing delivery suggests a need for contingency.

2.3.65. Thirdly, an issue is that there is a case to be made for the plan period starting a year earlier, with a view to starting at the point of the most recent monitoring data (i.e. such that there is a clear and accurate understanding of anticipated supply from sites with planning permission). Specifically, adding 2026/27 to the plan period would mean having to provide for an additional year of LHN (1,164 homes), whilst anticipated supply in the monitoring year is just 257 homes. In short, were the plan period to start a year earlier then there would be a clear case for additional allocations.

- 2.3.66. Fourthly, there is the matter of potentially setting the housing requirement above LHN in order to make some modest provision for unmet need, or such that there is flexibility to provide for unmet need (there is significant risk of unmet need from elsewhere in the sub-region, as discussed in the main report, and as discussed in previous Interim SA Reports). However, at this stage it is difficult to envisage higher growth to the point where the housing requirement can be set above LHN.
- 2.3.67. Overall, there is a clear 'housing' case for maximising plan period supply, plus there is a clear case for maximising supply from smaller sites that can deliver earlier in the plan period, and which will tend to be associated with relatively limited delivery risk. These are the key factors that lead to an overall preference for Scenarios 5 and 6.
- 2.3.68. Further considerations are:
- A geographical spread and the mix of sites is important in terms of meeting a diversity of needs (including settlement specific needs) and ensuring a diverse portfolio of sites that minimises delivery risk (albeit risk can be mitigated by a supply headroom). Also, a diversity of sites supports a diversity of housebuilders including SMEs.
 - Urban sites tend to be associated with delivery risk, but it is noted that a highly iterative approach has been taken to establishing the trajectory of supply from urban sites.
 - Pedham Place is clearly well placed to deliver a good mix of homes alongside specialist housing and a Gypsy and Traveller site (discussed below).
 - There is a need to account for concentrations of growth from a perspective of market saturation potentially leading to delayed delivery, but it is not clear that there are any significant concerns. Higher growth at Edenbridge (Scenarios 2 to 6) could potentially generate a risk, i.e. such that there might be a need for additional supply headroom.
 - With regards to a new settlement at Broke Hill, whilst the smaller scheme assumed under Scenario 1, 2, 3 and 6 likely has strong delivery credentials (there is a pending planning application), the deliverability of a larger more comprehensive scheme (Scenarios 4 and 5) is questionable as this would involve three landowners and there is not known to have been any significant collaboration between them to date.
 - There is a clear 'housing' case to be made for higher growth at Westerham, which is a matter that has been explored thorough past appraisal work and consultations. House prices are high and the settlement has seen very limited growth over recent times.
 - The District benefits from strong development viability, but there is nonetheless a need to direct new homes to locations / sites with good viability credentials, as far as possible, with a view to delivering the full policy quota of affordable homes (alongside delivering on wider objectives, e.g. relating to infrastructure delivery and built environment decarbonisation) and also ensuring a policy compliant tenure split (to include a good proportion of social rented homes). Scenario 1 is tentatively supported in this regard, although there is a need for ongoing scrutiny of what can realistically be delivered at challenging urban and PDL sites, recognising that there is also a need for them to come forward in a timely manner in line with the committed trajectory.
- The new proposed policy approach is to require 40% affordable housing for the great majority of greenfield allocations, which is a decrease on the previous proposal (50%). However, there remains a tenure split heavily weighted to social housing (which is the tenure that requires the greatest level of subsidy).
- With regards to older persons housing, under Scenario 1 the situation is thought to be broadly unchanged from 2025, when the Interim SA Report stated: *"... there is a notable boost to the proposed baseline supply since the previous stage; specifically the cluster of proposed allocations at South Darenth. Also, it is now understood that there is an opportunity to deliver... older persons housing units...at Pedham Place... and a new retirement village... at Broke Hill Golf Course..."*
 - **Gypsy and Traveller accommodation needs** – the latest situation is that Scenario 1 generates 70 pitches unmet need. This includes a site for Pedham Place. The Interim SA Report in 2025 stated:

“The previous Interim SA Report (2023) stated:

“... this may prove to be a key matter for consideration at the next stage of plan-making given that... the identified supply of new pitches is significantly below the identified need. Consideration might be given to new Gypsy and Traveller pitches as part of a Pedham Place new settlement, although delivering new pitches at strategic allocations can be a sub-optimal solution, including from a delivery perspective... Every effort must be made to meet needs....”

The identified supply has been boosted only very marginally since 2023 such that, moving forward, this must be a focus of plan-making, because poor accommodation is a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators. A blog prepared on behalf of the RTPi explains how failing to provide for accommodation needs is all too common including because providing for needs is often deferred by local plans, for example the following are recent case studies:

- Maidstone – the Local Plan was adopted in 2024 with reliance on a follow-on plan to meet a need for 500+ pitches, and that plan has made limited progress.*
- Windsor and Maidenhead – the Local Plan was adopted in 2022 on the assumption that a follow-on plan would be adopted, but there has been no progress.¹⁷*
- Rugby – the Local Plan was adopted in 2019 with an unmet need to be addressed through a follow-on plan, and now a need for 94 pitches is being dealt with through the emerging new Local Plan.¹⁸*
- Wiltshire – the Inspector examining the Local Plan recently wrote to the Council explaining: “... we note that the Plan does not specifically address the matter of travellers housing needs as it is otherwise intended to be dealt with under a separate Gypsies and Travellers [plan]... anticipated to be adopted by Quarter 3 of 2025. In light of that situation, we would welcome an update on the current status of the... DPD, together with the Council’s view as to whether there should be provisions in the Plan to ensure certainty of how those needs would otherwise be met in the event that the... [plan] were not to reach adoption.” As of February 2025 there were understood to be some issues, as reported here.”*

- 2.3.69. In conclusion, Scenario 2 performs very poorly as the Local Plan would generate significant unmet need and this scenario also assumes non-allocation of Pedham Place, which is strongly supported including because it would deliver a Gypsy and Traveller site. Generating unmet housing need is highly problematic, from a housing perspective, for two reasons. Firstly, housing need must be met as close to source as possible. Secondly, there is currently little or no certainty regarding where, when or even if any unmet need generated would be provided for, such that it might ultimately stay unmet. Unmet housing need is already a concern in the sub-region, although it is acknowledged that there will be good potential to address issues following LGR and Devolution.
- 2.3.70. Scenario 6 performs well because total supply over the plan period would significantly exceed LHN, but there would be a need for a stepped requirement, and it seems unlikely that the housing requirement over the plan period could exceed LHN. Also, it is not possible to predict a significant positive effect for Scenario 6 because there would be significant unmet need in respect of Gypsy and Traveller pitches (the additional site at Edenbridge assumed under Scenario 6 was not proposed to deliver Gypsy and Traveller pitches in 2025, but this is an option that might be explored).

¹⁷ The Inspectors Report stated: “It is unfortunate that the Traveller Local Plan has been delayed, but... good progress has been made... Most recently, an Issues and Options Report... [was] published for consultation.”

¹⁸ The Inspectors Report stated: “Whilst the Plan does not provide a supply of deliverable and developable sites to meet the accommodation needs of gypsies and travellers in full, I am satisfied that the combination of the criteria based approach in Policy DS2 and a Gypsy and Traveller Site Allocations DPD will enable the Council to meet [needs].”

Landscape

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
2	1	1	1	2	2

2.3.71. Landscape is clearly a major constraint to growth within the District, as has been discussed in detail across the course of the plan-making / SA process.

2.3.72. Beginning with Pedham Place, the Interim SA Report in 2025 stated:

“... the 2023 Interim SA Report tentatively supported Pedham Place from a landscape perspective notwithstanding a location within the NL, stating:

“... the site is located within the [NL] on raised ground above the Darent Valley to the east. However, this is a plateau such that there is limited intervisibility with the river corridor and other key viewpoints, albeit a footpath does pass through the site that is potentially important in terms of linking Swanley to the river corridor. Also, the site is closely associated with major road infrastructure and comprises somewhat degraded land... Importantly, the site is also being considered as part of a wider mixed-use masterplan, to provide a new multipurpose stadium complex (24-28,000 seats)... A larger scheme of this nature would clearly give rise to much more significant concerns from a landscape/[NL] perspective.”

Matters have now moved, as discussed in Section 5, given a new strategic focus on avoiding major growth in the NL and also in light of the evidence provided by the Landscape and Visual Evidence Study (2024) (N.B. referred to above as simply the ‘Landscape Study’ as a shorthand). Specifically, the Study concludes that whilst the potential significance of landscape impacts is ‘high’ there is good potential for mitigation that could reduce impacts to ‘low-medium’.

The Study compares the option of supporting Pedham Place to the option of several NL urban extensions, and concludes:

“[Pedham Place] would be more able to accommodate development of the type proposed due to its land use, character, context and larger size. This site offers more opportunity for incorporating more extensive mitigation, and there are also more opportunities to provide benefits to landscape and visual amenity, and more potential to provide enhancements that may further the purposes of the [NL], both on and off-site, as well as compensatory mitigation and benefits for local communities.”

2.3.73. The latest situation is that – whilst work has been ongoing to consider how to avoid and mitigate impacts through masterplanning, design and infrastructure planning, and the latest situation is that the Wasps RFC stadium is no longer allocated – there is a need to give weight to the major concerns raised by the Kent Downs National Landscape Team through the consultation in 2025. As such, there is a preference for scenarios that would avoid allocation in the National Landscape, even though the effect could be that the Local Plan struggles to progress to adoption (leading to ongoing planning under ‘the presumption’) or is adopted with a supply that leads to significant unmet need (which might then have to be provided for elsewhere in a constrained sub-region) and also a supply that may lack a sufficient headroom over-and-above the housing requirement (leading to delivery risk and therefore a risk of facing ‘the presumption’).

2.3.74. Further considerations in respect of the variable growth locations are as follows:

- Edenbridge – higher growth under Scenarios 2 to 6 gives rise to limited concerns, other than in terms of challenging containment / a risk of ongoing sprawl.
- Swanley – higher growth under Scenarios 2 to 5 would impact the gap to Swanley Village, but there is a case for comprehensive masterplanned growth in this area in order to minimise the risk of suboptimal piecemeal expansion over time.
- Hextable – higher growth under Scenarios 2 to 5 would impact a sensitive settlement gap but the possibility for a well-masterplanned cross-border scheme that retains settlement separation in perpetuity might be envisaged.
- Kemsing – higher growth under Scenarios 2 to 5 could help to ensure a comprehensive approach to growth south of Kemsing, but the Kent Downs National Landscape Team raised some concerns through the consultation in 2025:

“This site will be prominent in views for the escarpment and the Kemsing Down Nature Reserve directly to the north [separated by the built form of Kemsing] and we therefore raise concerns at this stage as to the scale and density proposed here. In order to ensure that additional development here avoids or minimizes adverse impacts on the adjacent National Landscape [separated by the built form of Kemsing], and in particular the panoramic views out over this site from the Kemsing Downs Nature Reserve it will be important that development is appropriately mitigated and landscaped with appropriate use of materials.”

- Broke Hill – the Interim SA Report in 2025 stated: *“a new settlement at Broke Hill Golf Course and the two adjacent SHELAA sites has the potential to be fairly well contained within the landscape assuming that the three SHELAA sites are considered in combination (as opposed to just considering the main SHELAA site that was previously a focus of a dismissed appeal, recognising that there would then be ongoing pressure to expand into the adjacent two SHELAA sites). Green Belt Assessment has identified a concern regarding the sprawl of Orpington and, in turn, Greater London, which is why the sites are not identified as grey belt. However, it is difficult to translate this into a concern from a landscape perspective. Whilst there could feasibly be nearby growth around the edge of Orpington (LB Bromley) this cannot be foreseen.”* Overall there is likely a preference for a smaller new settlement here (Scenarios 1, 2, 3 & 6) such that it is seen as a distinct new settlement rather than extension of London’s built form.
- Westerham – whilst the Kent Downs National Landscape Team’s 2025 consultation responses does not comment on the possibility of higher growth at Westerham (as explored through the appraisal of reasonable alternative growth scenarios at the time), it seems likely that they would raise significant concerns with Scenario 5.

2.3.75. With regards to growth locations that are a constant across the growth scenarios:

- Otford – the Interim SA Report in 2025 stated that the site: *“... has reasonable containment in Green Belt terms, but landscape sensitivity given the adjacent NL, e.g. views from Telson Lane along which runs the North Downs Way. It is currently unclear what use would need to be made of Telson Lane in order to ensure good access to the site.”* The Kent Downs National Landscape Team then raised some concerns: *“As the Sevenoaks Landscape Sensitivity Assessment advises, this area plays an important role in the perception of a gap between Otford and Sevenoaks to the south. It has Low to Medium sensitivity for 2-3 storey residential housing. The western edge of the existing housing development is largely open with little vegetative screening and development here could therefore provide the opportunity to improve the existing settlement edge. Should this allocation go forward into the Regulation 19 submission Local Plan we would wish to see policy wording requiring built development to be focused on the eastern parts of the site with a substantial landscaped buffer provided along the western and southern boundaries to soften the existing settlement edge, its impact in views from the escarpment to the west and the interface with users of the North Downs Way. Any development of this site should be designed and laid out in such a way as to minimize the impact on the character of the Kent Downs National Landscape and restricted to a maximum of two stories in height to reflect existing development in the locality and the landscape sensitivity of the site.”* The latest situation is that the proposed capacity is increased from 150 to 203 homes.

- Sevenoaks – through the consultation in 2025 the Kent Downs National Landscape Team raised a concern with Land West of Brittain's Lane, and so it is notable that the latest proposal is to reduce the capacity of the site from 65 to 56 homes. Another key site is Brittain's Lane, Kippington (228 homes), which was not previously an allocation in 2025. A larger version of the site has been considered in detail across the course of the plan-making / SA process, and the current smaller site boundary excludes the NL, but nonetheless it may well be that the National Landscape team has concerns, as the site is adjacent to the NL along much of its boundary.

2.3.76. In **conclusion**, at this stage it is appropriate to predict a significant negative effect for those scenarios that would involve allocation in the Kent Downs National Landscape, in light of the concerns raised through the consultation in 2025. However, this is not a clear cut conclusion, because there could be knock on implications for landscape objectives, as discussed. Finally, the following recommendation from 2025 still stands:

“... similar to the discussion above under ‘historic environment’, there is a need for further work to consider site specific policy / masterplanning including with a view to ensuring comprehensive schemes with strong boundaries that minimise the risk of development creep/sprawl.”

Land, soils and resources

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
1	2	2	2	2	1

2.3.77. New Agricultural Land Classification (ALC) data was recently published which shows that all of the variable growth locations other than Edenbridge are associated with 'best and most versatile' BMV agricultural land (although it is unclear for Westerham, with the sites in question shown as comprising a mix of grade 1 quality land, which is land of the highest quality, and grade 3b quality land, which is not classed as BMV). However, Pedham Place is not in agricultural use, and it is unlikely that it could be brought into agricultural use. Also, and in line with previous appraisal conclusions, it is difficult to suggest a case for lower growth because Sevenoaks does not stand-out as constrained in the sub-regional context, with neighbouring authorities to the east associated with extensive BMV land. With regards to significant effects, previous appraisal work has concluded a 'neutral' effect and Natural England has not raised any concerns. The consultation response from Natural England does raise some concerns regarding specific large sites, but not in terms of the overall strategy (and it is noted that a primary concern is raised regarding the proposed strategic urban extension to the north of Sevenoaks, but this site has been surveyed and found to comprise 3b quality land).

2.3.78. Finally, it is recognised that aligning the Local Plan with the Kent Minerals and Waste Local Plan is a further important consideration. The Key Diagram is available [here](#), but it is difficult to conclude that this is a significant constraint to growth at any of the site options currently in question, including because safeguarding is not always an absolute (particularly where safeguarding areas are very extensive). KCC commented in 2025:

"It is noted in Policy ST2 of the proposed local plan details a significant number of housing and mixed-use sites... The sites are listed, though not detailed. Therefore, it is not possible to be definitive in determining if these sites have any land-won safeguarded mineral or waste management/mineral processing facility implications that again would require to be assessed for any exemption from [safeguarding policy]. The County Council would be happy to work with you once sites are formalised. In light of the above, SDC may wish to consider the issues raised before moving to a Regulation 19 public consultation, given the constraining potential of mineral and waste safeguarding policies in the determination of any Sevenoaks Local Plan's robust deliverability..."

- 2.3.79. One other consideration is land west and north of Westerham (Scenarios 5), where there is a safeguarding area for construction sand and permitted scheme to fill a worked-out quarry with waste from the building industry.

Transport

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
2	1	1	1	1	2

- 2.3.80. The equivalent appraisal from 2025 was as follows:

"This is a crucially important issue for plan-making and will need to be a focus of further work ahead of plan finalisation, with a view to demonstrating a vision-led approach. Overall, there are now greater concerns relative to the equivalent appraisal in 2023, including on the basis of a recent Transport Study (2025) which flags some concerns in respect of problematic traffic congestion (an issue in and of itself, but also because of implications for bus services, cycling and generally vision led transport planning).

However, on the other hand, generating unmet need is highly problematic in transport terms (as has been discussed) and there is generally support for some of the variable growth locations. In particular, there is a transport case for Broke Hill Golf Course. It is also the case that a high proportion of the new proposed baseline allocations since 2023 are in proximity to a train station or are in the north of the District which generally has good accessibility to higher order settlements. Also, there is understood to be a transport opportunity associated with further strategic growth north of Sevenoaks.

A key issue for ongoing consideration is the performance of Pedham Place. The Transport Study flags some concerns, most notably in respect of M25 Junction 3... This represents a concern from a delivery perspective, given the cost of junction upgrades, although a solution within the plan period might be assumed. It is noted that M25 Junction 6 capacity was a major issue for the Tandridge Local Plan.

Finally, there is a need to highlight the new proposed approach of delivering considerably higher growth to lower tier settlements, which will need to be considered further following the current consultation from a transport, decarbonisation and accessibility perspective. As well as villages, the strategy for New Ash Green requires further consideration from a transport perspective, including alongside the question of a new secondary school at Pedham Place. Amongst other things, there will be a need to consider how this strategy aligns with the vision for bus connectivity. It will be important to work closely with partner organisations including neighbouring local authorities, to consider how growth locations in combination along corridors might deliver benefits.

In conclusion, the previous conclusions from 2023 still broadly hold true:

- *“Growth quantum - the previous ISA Report (2022) concluded: “In the absence of a sub-regional plan identifying optimum locations for strategic growth, from a transport perspective, it would likely be a challenge to evidence a conclusion that transport factors serve as a reason for setting the housing requirement below LHN.” Having now given consideration to settlement and site-specific growth options there is potentially now a greater degree of concern regarding traffic congestion...”*
- *“In conclusion, there is a need for further work to consider transport issues and options at Pedham Place, and there is a concern with growth here in combination with higher growth at West Kingsdown. However, there is otherwise a clear need to adopt a Local Plan with a view to effective strategic transport planning.”*

2.3.81. Overall, the appraisal conclusion now reflects: A) a concern with higher growth including as this would involve Pedham Place; B) a concern with generating unmet housing need; and C) a transport case for supporting Broke Hill Golf Course.”

2.3.82. Further points made within the Interim SA Report in 2025 include:

- *“Focusing on Pedham Place, the site benefits from being well linked to a town centre and a location within fairly easy cycling distance of two train stations (with a good service). However, there is a need for much further work to generate a better understanding of the potential to achieve: A) self-containment / trip internalisation; B) offsite trips by active and public transport; and C) car movements without creating problematic traffic congestion. Topography is an issue, and road / rail infrastructure and employment land would act as a barrier to achieving an attractive and suitably high quality walking and cycling route between the site and Swanley.”*
- *“Swanley, Hextable and South Darenth – a much higher growth strategy is proposed relative to 2023 in the context of... limited work to date around vision-led transport planning.”*
- *Edenbridge – there is tentative support for a high growth strategy... from a perspective of supporting modal shift away from the private car to active and public transport, albeit the settlement is not as well connected as Sevenoaks and Swanley.*
- *Smaller settlements – there is a need for further scrutiny of the proposal to direct a considerable amount of growth to lower tier settlements [from a transport perspective].*
- *“... it is important to emphasise the importance of proactive local plan-making to enable effective strategic transport planning...” It is important to be recognise that the current reasonable growth scenarios represent a major change of tack from 2023 primarily as a result of a new much higher LHN figure and the introduction of grey belt. This creates a major challenge for strategic transport planning and, in turn, a challenge in terms of planning for good air quality.”*

2.3.83. The latest situation is as follows:

- *Pedham Place – KCC stated support through the consultation in 2025: “The Pedham Place development has the potential to create a mixed community, enabling people to live and work in proximity. Its location adjacent to the M25 and M20 and the severance effect of the M25 in terms of creating sustainable links to Swanley are drawbacks in terms of the plan's sustainable intentions. However, the inclusion of the site enables the delivery by the developer of potential strategic infrastructure improvements, such as at M25 junction 3.” Latest understanding is that Pedham Place can deliver an upgrade to M25 junction 3 alongside a range of other transport upgrades / measures; however the latest Transport Assessment (2026) concludes [emphasis added]:*

*“The comparison of travel times between the 2042 Local Plan scenario and the 2042 Forecast Baseline indicates only marginal differences overall. This may, in part, be attributable to the network already operating under congested conditions in the Forecast Baseline... Route 2 (B2173 London Road / M25) and Route 5 (M20 / A20 Main Road, Gorse Hill) experience the most notable increases in journey times, with rises ranging between 12% and 17% during the PM peak period. This increase is likely driven by additional traffic associated with... **Pedham Place**....”*

- Growth quantum – whilst generating unmet need is inherently problematic in transport terms, in there does appear to be a transport case for lower growth in Sevenoaks given the outcome of the latest Transport Assessment (2026) – see below.

2.3.84. In conclusion, at this stage it is considered appropriate to flag a concern with scenarios including Pedham Place and to support scenarios that would replace Pedham Place with geographically dispersed smaller sites (some of which have some merit in transport terms, particularly the option of a larger new settlement at Broke Hill adjacent to a rail station) and even if the effect would be to deliver low growth / generate unmet need (Scenario 2). With regards to significant effects, on balance a 'moderate or uncertain' negative effect is predicted across the scenarios, including noting that the Transport Assessment remains in draft, with the report explaining: "... it is possible that not all junctions identified in [Figure A below] will ultimately be shown to experience significant operational issues or require mitigation once assessed using local junction models."

Figure A: Outcomes of the Transport Assessment (2026)

Area		Road /Junction	2019 Base	2042 Forecast Baseline	2042 Local Plan
Swanley, Eynsford, New Ash Green and Halstead	V/C >85%	Bartholomew Way	>85%	>100%	>100%
		High Street	>85%	>100%	>100%
		M25 between J3 and J4 Southbound	-	>85%	>100%
		A20 Main Road	-	>85%	>100%
	LOS E or F	High Street/St Georges Road	E	E	F
		M25 J3	F	E	F
		Hewitts Roundabout	F	F	F
Sevenoaks Town, and Otford	LOS E or F	A25 / Bradbourne Road	E	F	F
		Seal Road/Filmer Lane/ Seal Hollow Road	E	F	F
		Westerham Road/Larkfield Road	E	F	F
		A25 / Otford Road / St Johns Hill	F	A	A
		High Street/Pembroke Road	F	F	F
		Westerham Road/ A21 Onslip SB	F	F	F
		Station Road / Shoreham Road / Pilgrims Way E	E	E	F
		Westerham Road / Cold Arbor Road	-	E	E
		Worship Road / Witches Lane	-	E	E
		A25 London Road / Maidstone Road	-	E	E
		Morleys Roundabout	-	E	E
		Mont St Aignan Way/Lingfield Road	F	F	F
Edenbridge	LOS E or F	Mont St Aignan Way/Stangrove Road	F	F	F
		B2026 Station Road/High Street	E	E	E
		B2026Main Road / Hilders Lane / Hillcrest Road	-	-	F

Water

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	- Pedham Pl. + Edenbridge + Swanley	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	- Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	+ Edenbridge
?	?	?	?	?	?

- 2.3.85. The Interim SA Report in 2025 concluded that there was significant uncertainty but overall a degree of concern across the growth scenarios at the time, stating:

“The following text is taken from the previous Interim SA Report (2023). Through the consultation in 2023/24 few comments were received on the key matter of wastewater treatment capacity (see the summary of comments received from organisations [here](#)).

In the absence of a Water Cycle Study it is not possible to elaborate on the conclusion from the previous ISA Report (2022). Specifically, the report concluded: “Water resource and water quality objectives, whilst important considerations... are unlikely to have a significant bearing on... whether the local plan should provide LHN in full or, alternatively, provide for lower growth and therefore export unmet needs.”

Water Cycle Studies typically give consideration to: wastewater management (sewer network and capacity at wastewater treatment works (WwTWs); water resources / supply; water quality; and the specific issue of protecting chalk streams.

However, it is wastewater treatment that is typically a key issue for local plan spatial strategy and site selection, and this is also an issue high on the agenda nationally at the current time. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water). However, there are major cost and lead-in time implications, and a risk of unforeseen issues and delays. As such, there is a need to provide the water companies with early certainty regarding growth locations. Also, strategic growth locations can be conducive to planning for upgrades.

There will be a clear need to consider waste water treatment in support of a new settlement at Pedham Place. If it transpires that wastewater would need to drain to the Long Reach sewage treatment works in Dartford Borough, on the River Thames, then there is a need to consider that this works already serves a population of 837,000 and includes within its catchment significant growth / potential growth locations. Thames Water’s Long Reach Catchment Plan proposes a new treatment works in the District.

With regards to water supply, this can be a key issue within problematic water resource zones. As well as leading to impacts for potable water supply, ‘water stress’ also affects the natural environment, particularly riverine and wetland habitats. However, water companies put in place long term plans to balance water supply and demand, and there are not currently any water resource zones locally that are known to be problematic to the extent of constraining growth. It is difficult to draw clear implications for the Local Plan from the South East Water Resource Management Plan (WRMP).

With regards to DM policy, it is noted that the proposal is to adopt the national ‘optional’ standard of 110 litres per person per day. This is likely to be appropriate in the absence of specific local issues in respect of water stress. The emerging Milton Keynes Local Plan is notable for requiring 93 litres per person per day for all major developments.

In conclusion, there is a need for further work, perhaps most notably to confirm any growth-related issues (also feasible opportunities) in respect of wastewater treatment, including relating to Pedham Place. At this stage it is not possible to differentiate between the scenarios, but it is appropriate to flag a 'limited or uncertain' negative effect ahead of receiving consultation responses from the Environment Agency and the water company. Comments on the merits of the growth scenarios would be welcomed."

- 2.3.86. With regards to water supply, the latest situation is that the IDP (2026) explains the following context: *"Recent incidents of water supply disruption in parts of Kent, including Tunbridge Wells and Kemsing, have highlighted the importance of maintaining a resilient and reliable water supply. These events, which in some cases left customers without water for several days, are understandably of concern, particularly in the context of planned growth and the need to ensure... access to water, as a basic necessity..."*
- 2.3.87. It also discusses the inherent challenge of planning for water supply: *"Water supply planning is undertaken by the relevant water companies through [Water Resource Management Plans; WRMPs], which are prepared on a five-year statutory cycle... The three water companies' respective WRMPs 2024 are based on 2022 population forecasts and do not fully reflect the scale of growth now proposed in the Local Plan."*
- 2.3.88. Further information regarding the discrepancy regarding assumed rates of growth in WRMPs and the proposed rate of growth through the Sevenoaks Local Plan is set out in an appendix to the IDP. However, despite these discrepancies there is no clear evidence to suggest that water supply – and, in turn, concerns around low water levels affecting the water environment – will be an issue for the District over the plan period.
- 2.3.89. With regards to capacity at wastewater treatment works, the IDP again explains the inherent challenge: *"The two water companies' respective Drainage and Wastewater Management Plans; DWMPs] model the impacts of population growth using housing growth assumptions drawn from adopted and emerging Local Plans available at the time the plans were prepared. As a result, they do not fully reflect the scale of growth now proposed in the Local Plan... DWMP catchment planning is high-level and used to identify potential options rather than committed infrastructure schemes. As such, the proposed treatment works remain at an early stage of investigation, with no confirmed site, design, funding or delivery programme. The Council will continue to engage with Thames Water and relevant stakeholders as this work progresses to understand any implications for the Local Plan and to ensure alignment with future wastewater planning and investment cycles."*
- 2.3.90. However, again there is no clear evidence that capacity at wastewater treatment works is a major issue with a bearing on the current appraisal, i.e. that there is a risk of capacity breaches leading to water pollution or delivery of housing sites having to be delayed in order to allow time for capacity upgrades to be delivered. The IDP's schedule of required upgrades lists numerous required upgrades to treatment works, but it is not possible to draw inferences for the current appraisal. What it does, however, serve to highlight is that there are inherent delivery risks associated with local plan supply trajectories, such that there is a need to ensure a healthy supply headroom over-and-above the committed housing requirement, at least in the early years of the plan.
- 2.3.91. In conclusion, and in line with the conclusion reached in 2025, there is considerable uncertainty and overall a need to flag a 'moderate or uncertain' negative effect.

2.4. The preferred growth scenario

- 2.4.1. Officers provided the following text to explain why Scenario 1 is 'justified':

“Sevenoaks considers that the approach taken is acceptable in that it broadly aligns with paragraph 11.b of the NPPF, which sets out that strategic policies should, as a minimum, provide for objectively assessed need, whilst noting that there is likely to be only a very small shortfall in meeting need, if any at all, despite the significant constraints found within our district. Advisory meetings with the Planning Inspectorate and the Planning Advisory Service have confirmed that meeting need is an overriding priority. Our Local Plan includes a range of sites of different sizes and across a range of locations and settlements, with the greatest focus on our most sustainable higher-tier settlements or locations, including ‘well-connected’ rail stations. Sites are spread across our existing settlements, both within the settlements, as well as being on the edges, with allocations on Previously Developed Land and greenfield sites (both grey belt and Green Belt). Housing supply also includes a windfall element which is considered justified based on previous windfall delivery and extants. As such we are putting forward a broad range of site allocations that will help us in terms of providing for our need.

Pedham Place is a key element in delivering on our housing need, albeit it is located in the Kent Downs National Landscape to which great weight is required in relation to conserving and enhancing its natural and scenic beauty. We are proposing the allocation of major development, which we recognise will have an impact, both directly on the immediate landscape and with potential impact on views, both of the site and from the site (See our Landscape and Visual Evidence for the Sevenoaks Local Plan 2040). However, we recognise that with respect to views in particular there is potential to largely mitigate its impact and that whilst the proposed mitigation would result in alterations to the views, those changes would be in character. Whilst acknowledging the impact, we consider the site allocation to be in the public interest and that there are exceptional circumstances (See our National Landscape Exceptional Circumstances and Public Interest Paper June 2026). We consider these to include the fact that this site is in a sustainable location, it would help deliver against all of our identified needs and it would provide opportunities in relation to strategic infrastructure, which would otherwise be long delayed or potentially not forthcoming and furthermore, some of this infrastructure will help meet some wider community needs e.g. the provision of a secondary school.

The cumulative Transport Assessment work undertaken to support the Local Plan highlights key junction and link hotspots which are forecast to arise by 2042 and which are likely to persist with the Local Plan allocations, forecasting notable increases in traffic flows along several key corridors, exacerbating capacity pressures and leading to deterioration across a number of junctions and corridors. However, junctions have been subject to detailed local junction modelling, which will provide a more robust evaluation of operational performance. This detailed assessment is likely to reveal that not all the junctions will experience significant operational issues or whether mitigations measures will be required. Where necessary, these will need to be secured to address the issues highlighted, and are detailed within the Infrastructure Delivery Plan (IDP). The Local Plan also allows for measures at Junction 3 which will help with capacity, benefiting both the future residents/users of Pedham Place and wider users of the network.

The Council’s previous Local Plan generated unmet need and was withdrawn following the Planning Inspector’s comments regarding this matter and the Council’s approach to the Duty to Co-operate. As such the Council is very much aware of the implications of generating unmet need. The Council is also aware of the emphasis on meeting need within the 2024 version of the NPPF, reflecting this Government’s ambition to build 1.5m dwellings in this parliament, and the fact that the Government is challenging those authorities that are not meeting their need. We also consider it important to meet our need as this will mean we can: deliver infrastructure improvements; deliver locally affordable housing for local residents; stimulate employment opportunities, inward investment and economic growth; protect our important landscapes and leave a lasting legacy. Despite multiple requests in 2024, 2025 and 2026, none of our neighbouring authorities have been able to assist with any unmet needs, due to their own constraints and difficulties in meeting their own housing targets, and therefore we are unable to rely on the ‘duty to co-operate’ to provide any element of our housing supply.

Edenbridge is our third largest settlement (behind Sevenoaks Urban Area and Swanley). A significant number of sites were promoted in this area and have been included for allocation in and adjacent to Edenbridge. However, to achieve sustainable and proportionate development and extension of this settlement, we have chosen to review growth at Edenbridge. This is due to infrastructure capacity, for example in relation to the road network (which is constrained by multiple signal-controlled single-lane railway bridges). In particular, previous allocation EDEN16, a site to the north-east of Edenbridge, is now not being allocated due to the cumulative impact, the unnatural extension to Edenbridge that would arise and because it is considered to result in an unsustainable extension due to the distance from the local centre and its facilities.

The scale of Pedham Place at approximately 141ha, is such that it is capable of being planned to incorporate significant levels of green infrastructure and given its location in the National Landscape, will be expected to do so. Information submitted by the land promoter indicates high levels of green space (55ha), with green infrastructure including greenways linking across the site, with extensive tree planting, opportunities for wildlife and providing the structure for a sustainable drainage system using swales, rain gardens etc. It also proposes the inclusion of green space comprising habitats found within the Kent Downs National Landscape. We have also produced a Development Brief which will secure sets vision including green corridors radiating out and providing attractive walking and cycling connections, supporting biodiversity and embedding nature throughout the public realm.

Scenario 5 would result in a greater shortfall in terms of meeting housing need, than scenario 1 but it would not be significantly lower than that of scenario 1. However, it would rely on a number of smaller sites coming forward and it is this which is key to our considerations, as scenario 1 includes strategic scale growth at Pedham Place which can secure both a higher number of homes but which can also, due to its scale and location, secure a range of strategic infrastructure, which will meet the new residents' needs but also, in some instances, contribute to the needs of the wider community.

Furthermore, our evidence (Landscape and Visual Evidence for the Sevenoaks Local Plan 2040), which undertook a comparative assessment of the impact of 9 sites in the National Landscape on the edges of three settlements, including Westerham, and development at Pedham Place, concluded that Option 2 (Pedham Place) would be likely to cause the least harm to the Kent Downs National Landscape. This is due to its larger size, providing more opportunity for incorporating more meaningful mitigation. In addition, noting opportunities to provide benefits to landscape and visual amenity, enhancements that may further the purposes, as well as compensatory mitigation and benefits to local communities.

3. The Proposed Submission Local Plan

- 3.1.1. An appraisal of the plan as a whole will be completed ahead of publication, essentially building upon the appraisal of growth scenario 1 by factoring-in proposed development management policies, including those for specific sites. As part of this, the appraisal will explore how a balance has been being struck between competing objectives when establishing development management (DM) policies in the context of development viability parameters.¹⁹ At the current time the growth scenarios appraisal is key information to inform elected member deliberation and decision-making.

¹⁹ The interim SA Report in 2025 concluded as follows regarding development management policies: "Note that the appraisal above also considers emerging DM policies, particularly those with development viability implications including those relating to affordable housing, built environment decarbonisation / net zero development and BNG. The appraisal highlights a number of DM policies that might be given further consideration; however, it is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of net zero development, but there would be implications for wider objectives with cost implications."

4. Next steps

- 4.1.1. Following publication under Regulation 19 the intention is to submit the Local Plan for Examination in Public (EiP) alongside representations received and the SA Report (as previously published). The EiP will be overseen by one or more appointed Planning Inspectors, and there will be a consultation on Main Modifications in due course. If the outcome of the EiP is positive then the Local Plan will be adopted, likely in 2027.

DRAFT

